

June 19, 2019

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Notice of Oral Ex Parte Presentation; Further Streamlining Part 25 Rules Governing Satellite Services, IB Docket 18-314

Dear Ms. Dortch:

Intelsat License LLC (“Intelsat”) files this notice of ex parte presentation for inclusion in the record of the above-referenced proceeding information regarding a meeting that took place on June 17, 2019. The in-person participants were: Cynthia Grady, Giselle Creeser, and Oscar DeGuzman of Intelsat US LLC, Madeline Lottenbach of Wiley Rein LLP, representing Intelsat, and Jose Albuquerque, Karl Kensinger, and Kerry Murray of the Federal Communications Commission’s (“Commission”) International Bureau. Also participating by telephone were: Stephen Duall, Paul Blais, Jay Whaley, Kal Krautkramer, and Diane Garfield, all of the International Bureau.

During the meeting, the participants discussed Intelsat’s proposed additions to the Commission’s proposed rule changes in the Further Streamlining Part 25 Rules Governing Satellite Services Notice of Proposed Rulemaking (“NPRM”).¹ The participants also discussed the single network license and 60-day cure period proposals made in the NPRM.²

Specifically, the parties discussed the following Intelsat proposals:

- Changing § 25.118(e) to allow operators to continue providing service to customers during fleet management activities for relocations within $\pm 0.15^\circ$ of the assigned orbital location provided that the operator provides a certification that operations are limited to coordinated transmissions during the relocation and drift transition period. This change would increase the applicability

¹ See Comments of Intelsat License LLC, MD Docket IB 18-314 (filed Mar. 18, 2019) (“Intelsat Comments”).

² See *Further Streamlining Part 25 Rules Governing Satellite Services*, Notice of Proposed Rulemaking, IB Docket No. 18-314, FCC 18-165 (Rel. Nov. 15, 2018).

of the rule for operators and would benefit customers who would be able to continue to operate during a $\pm 0.15^\circ$ relocation. This would also reduce the workload on Commission staff as fewer operators would apply for modifications to allow customer operations during these limited relocation maneuvers.

- The deletion of § 25.112(a)(3), which requires dismissal of applications for satellite operations in a frequency band not allocated internationally for such operations. This rule unnecessarily prohibits Commission staff from determining on a case-by-case basis if operations in a frequency band currently not allocated internationally is in the public interest.
- The codification of the longstanding presumption that satellite operators' fleet management decisions receive due deference.
- Enlarging the geosynchronous orbit station-keeping box to 0.1° , which is consistent with the International Telecommunication Union standard.
- Minor modifications of earth stations should be expanded to include (1) adding a point of communication that is located within the coordinated arc specified in an earth station license; and (2) adding equipment operating within the emission mask of the licensed terminal emission and other authorized technical limits.
- Replacing the current earth station emission designator requirement with bandwidth, which is consistent the space station requirement.
- Extending the renewal period for earth station licenses to a 365-day period starting 365 days in advance of, and ending on, the license expiration date.
- Earth station antenna ID modifications should be considered a clerical or typographical change, not subject to FCC approval, since this change would not impact other service providers or the operational parameters of the license.
- A number of possible improvements to the Form 312 and Schedule B application system.

With respect to proposals in the NPRM, Intelsat discussed its support of the Commission's proposal to eliminate the notification requirement for minor earth station modifications. Intelsat and Commission staff also discussed the Commission's proposal for a single network license. The Intelsat representatives noted that Intelsat generally supports the single network license proposal, so long as this license type is optional, has its own licensing and regulatory fee categories, and is subject to safeguards to address warehousing. The NPRM leaves open a number of critical details, such as whether the proposal applies exclusively to geostationary orbit ("GSO") satellites or to both GSO and non-geostationary orbit ("NGSO") satellites and how the new system would deal with license modifications and renewals.³ The Intelsat representatives suggested the Commission consider issuing a further notice to work out the details of a single network license before adopting the system.

³ See Intelsat Comments at 5.

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Finally, Intelsat reiterated its opposition to a 60-day “cure period.”

Please direct any questions to the undersigned at (703) 559-6949.

Sincerely,

/s/ Cynthia J. Grady

Cynthia J. Grady
Senior Counsel
Intelsat US LLC

cc: Jose Albuquerque
Karl Kensinger
Kerry Murray
Stephen Duall
Paul Blais
Jay Whaley
Kal Krautkramer
Diane Garfield